

## REMARKS

This is intended as a full and complete response to the Office Action dated May 30, 2006, having a shortened statutory period for response set to expire on August 30, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-12, 14-17, 22-24, 27-30, 32-37, 43-51, 53, 55 and 72-81 remain pending in the application and are shown above. Claims 1, 27 and 80 have been amended to clarify the invention. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference.

### *Interview Summary*

A telephone interview was conducted with the Examiner, Bruce Patterson and Stefano Frontoni on August 23, 2006. The rejection of claims 1, 27 and 80 and proposed amendments of these claims as presented herein were discussed with respect to *Soderberg* (U.S. Patent No. 4, 565,496). An agreement was reached that the amendments overcome the rejections.

Claims 1-11, 15, 22, 23, 27, 80 and 81 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Soderberg* (US 4,565,496).

With respect to Claim 1, the Examiner states that *Soderberg* discloses a method of removing produced fluid from a well producing both gas and liquid, the method comprising: utilizing produced gas flowing from a formation to power a produced liquid pump; and carrying the produced liquid from the pump and the produced gas towards surface in separate fluid streams.

As clearly stated in *Soderberg*, produced gas and liquid create a liquid/gas interface that rises as liquid and gas flow into chamber 52, with the produced gas passing through venting valve 54 (column 6, lines 39 – 43). The vent valve is sized of suitable material so as to be closed when emerged in well liquid due to its buoyancy

and being open when not emerged in well liquid due to its weight in gas (column 5, lines 53-56). Closing of the vent valve triggers a signal generator-transmitter which may then cause a surface mounted receiver-controller to actuate a pump stroke (column, lines 39 – 41). Therefore, it is clear that the produced gas is utilized in the sense that it cooperates to control the vent valve 54, which in turn can actuate a pump. Furthermore, the pump, *i.e.*, piston 72, is moved by power fluid F which is derived from the pressure source P (column 9, lines 36 – 44).

Consequently, *Soderberg* does not disclose operating a produced liquid pump by flowing produced gas through a drive member of the pump as in the method according to Claim 1. Applicants respectfully request allowance of Claim 1 and any claims that depend therefrom.

With respect to Claim 27, the Examiner states that *Soderberg* discloses a method of bullheading a gas producing well containing liquid, the method comprising: pumping gas into a well to displace liquid lying in the well towards surface; allowing produced gas to flow from the formation and power a liquid pump once the level of liquid in the well has fallen below a predetermined level; and carrying gas and liquid from the pump towards surface in separate fluid streams.

The same arguments with respect to the teachings of *Soderberg*, such as the ones submitted for Claim 1, here apply. Specifically, *Soderberg* does not disclose operating a produced liquid pump by flowing the produced gas through a drive member of the pump. Applicants respectfully request allowance of claim 27 and any claims that depend therefrom.

With respect to Claim 80, the Examiner states that *Soderberg* discloses a method of kicking off a gas-producing well containing a liquid, the method comprising: pumping a gas into the well to force the liquid lying in the well back into a formation; allowing the gas and a produced gas to flow from the formation to power a liquid pump; and carrying gas, and liquid from the pump, towards surface in separate fluid streams.

*Soderberg* discloses power fluid (*i.e.*, all provided from the surface) that powers a piston, but *Soderberg* actually fails to disclose operating a produced liquid pump by

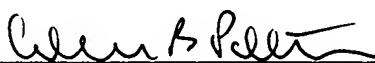
flowing the gas and the produced gas through a drive member of the pump. Accordingly, Applicants respectfully request allowance of claim 80 and any claims that depend therefrom.

Claims 12, 14, 16, 17 and 24 are objected to as being dependent upon a rejected base claim. Applicants submit that these claims are allowable based at least on their dependency to Claim 1 traversed above. Accordingly, Applicants request allowance of Claims 12, 14, 16, 17 and 24.

Claims 28 – 30, 32 – 37, 43 – 51, 53, 55 and 72 – 79 are allowed. Applicants acknowledge allowance to these Claims.

In conclusion, the reference cited by the Examiner does not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

  
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